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September 16, 2020

**VIA ECF**

The Honorable Ronnie Abrams  
United States District Judge  
Southern District of New York  
40 Foley Square, Room 2203  
New York, NY 10007

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**Re: Jennifer Eckhart and Cathy Areu v. Fox News Network, LLC, Ed Henry, Sean Hannity, Tucker Carlson, and Howard Kurtz, Civil Case No. 1:20-cv-05593 (RA)**

Dear Judge Abrams:

On behalf of Fox News Network, LLC, Tucker Carlson, Sean Hannity and Howard Kurtz (the "Fox News Defendants"), we write in response to the September 11, 2020 letter submitted by the Valli Kane & Vagnini firm (the "Letter"), which was filed contemporaneously with the Amended Complaint.

In short, the Amended Complaint has failed to cure the issues raised in the Fox News Defendants' Rule 11 motion. Areu is also wrong to claim that severance is warranted on the ground that she now seeks to be a Rule 23 class representative.

Given the above, the Fox News Defendants join Plaintiff's counsel's request for a further status conference to discuss a briefing schedule.

Respectfully submitted,

By: /s/ Kathleen M. McKenna  
Kathleen M. McKenna, Esq.  
*Attorneys for Fox Defendants*

Cc: All counsel of record (via ECF)